



April 5, 2012

United States Environmental Protection Agency - Region 2
DECA - PTSB - Toxic Substances (MS-105)
2890 Woodbridge Avenue (MS-105)
Edison, New Jersey 08837

Attn.: Henry Mazzucca, P.E., Chief

**Re: 9th Quarterly Status Report
PCB Remedial Action
Arsynco, Inc. Site
Carlstadt, New Jersey**

Dear Mr. Mazzucca:

In accordance with Section 5 of the USEPA's *Approval for Risk-Based Clean-up/Disposal of Polychlorinated Biphenyl Remediation Waste* for the Arsynco site, which became effective on July 21, 2009 (the "EPA Approval"), the following provides the 9th Quarterly Status Report for the PCB remedial action at the Arsynco facility.

The following activities/actions have occurred in relation to the site since the 8th Quarterly Status Report was submitted to EPA on December 29, 2011:

- On October 31, 2011, Arsynco received a letter from EPA that provided EPA's comments on the financial assurance documents previously submitted by Arsynco. On January 6, 2012, Arsynco submitted an e-mail reply to EPA's letter. The e-mail response was submitted to Ms. Vickie Pane, of EPA, and requested clarification and specificity on EPA's comments to ensure that Arsynco's responses would fully satisfy EPA's requirements. On January 10, 2012, Arsynco submitted a second e-mail to Ms. Pane that provided a signed version of the letter of credit, which addressed one of the comments contained in EPA's October 2011 letter, and again requested a response from EPA clarifying the inquiries stated in the January 6, 2012 e-mail. As of the date of this letter, no response has been received from EPA on these issues.
- As stated in the 8th Quarterly Status Report, on September 16, 2011, Arsynco submitted to EPA a revised version of the Engineering and Monitoring Plan (E&M Plan) for the site. The revised E&M Plan document provided details of the proposed approach to confirmatory soil sampling in the areas where PCB remediation waste materials are to be excavated. The confirmatory soil sampling program proposed in the revised E&M Plan was discussed in detail with EPA during a May 27, 2011 meeting at EPA's offices in Edison, New Jersey and was the same program that your office verbally agreed to support. As of the date of this letter, no response has been received from EPA on the revised sampling approach and the E&M Plan. Arsynco is awaiting EPA's response so that the pre-excavation sampling program can be completed to allow for the coordination and scheduling of the PCB remediation activities.

Henry Mazzucca, P.E.

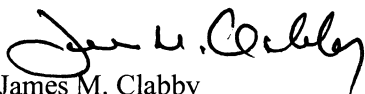
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The approval of the E&M Plan, as well as the resolution of the remaining financial surety issues, is critical to allow the PCB remediation program and the additional remediation activities required at this site to move forward. Arsynco would like to take advantage of the nice weather at this time to complete the extensive pre-excavation PCB sampling program outlined in the E&M Plan. Therefore, we respectfully request EPA's timely review and response to the E&M Plan and remaining financial surety questions.

Should you have any questions or require additional information regarding this matter, please feel free to contact me at (732) 295-2144.

Very truly yours,

A handwritten signature in black ink, appearing to read "James M. Clabby".

James M. Clabby
President

cc: Vickie Pane, USEPA
Atwood Davis, NJDEP
Ed Kelly
Douglas Reid-Green
James Dillon
Keith McManus, Esq.
Rusty Norris